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14 PACIFIC BELL TELEPHONE COMPANY

15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA

17 CALIFORNIA SPORTFISHING } CASE NO. 2:21-CV-00073-JDP
18 PROTECTION ALLIANCE, }
19 Plaintiff, } STIPULATION RE PROTECTIVE
20 v. } ORDER; [PROPOSED]
21 PACIFIC BELL TELEPHONE } PROTECTIVE ORDER
22 COMPANY, }
23 Defendant. } Magistrate Judge: Hon. Jeremy D.
24 Peterson
25 Complaint Filed: January 14, 2021
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27
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1 Having met and conferred, Plaintiff California Sportfishing Protection Alliance
2 (“CSPA”) and Defendant Pacific Bell Telephone Company (“Pacific Bell”) (together, the
3 “Parties” and each a “Party”) stipulate as follows:

4 WHEREAS, the Parties agree that the documents and other materials produced
5 through discovery may be subject to confidentiality limitations or disclosure due to federal
6 laws, state laws, and/or privacy rights, including, but not limited to, information involving
7 trade secrets, confidential business, financial or personal information and information
8 protected by California’s constitutional and common law right to privacy, or under other
9 provisions of California law or other applicable law;

10 WHEREAS, the Parties agree that to facilitate the exchange of information and
11 documents, certain provisions should govern the use and maintenance of information that
12 is subject to confidentiality limitations or disclosure under applicable law; and

13 NOW, THEREFORE, the parties respectfully and jointly ask that the Court enter an
14 order governing the use and maintenance of confidential information exchanged between
15 the Parties during discovery. A stipulated proposed protective order follows the Parties’
16 signature blocks.

17 DATED: January 11, 2024

18 Respectfully submitted,

19 KIRKLAND & ELLIS LLP

20 /s/ Hariklia Karis

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PROTECTION ALLIANCE

The filer of this document attests that all signatories listed above have concurred in the filing of this documents.